

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: Mary Giesin,	:	Bankruptcy Case No. 19-20451-CMB
Debtor.	:	Chapter 13
<hr/>		
Mary Giesin,	:	Document No.: 64
Movant,	:	Related to Document No.:
v.	:	Related to Claim No.: 5
Rushmore Loan Management Services, LLC as servicer for U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage-TT-V,	:	
Respondent.	:	
<hr/>		

**DEBTOR'S DECLARATION OF SUFFICIENT PLAN FUNDING**

Pursuant with the Notice of Mortgage Payment Change filed on November 17, 2022, after reasonable investigation and upon review of the existing Chapter 13 Plan, it appears to Debtor that the existing payment is sufficient to fund the Plan even with the proposed change for January 1, 2023.

The new post-petition monthly payment payable to Respondent is \$1,180.34, effective January 1, 2023, per the notice dated November 17, 2022. The Debtor's Plan payment provides for a monthly payment to Rushmore Loan Management Services, LLC as servicer for U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage-TT-V of \$1,232.00. Therefore, Debtor's Plan remains sufficient.

Respectfully Submitted,

Date: November 18, 2022

/s/Brian C. Thompson  
Brian C. Thompson, Esquire  
Attorney for Debtor  
PA I.D. # 91197  
Thompson Law Group, P.C.  
125 Warrendale Bayne Road, Suite 200

(724) 799-8404 Telephone  
(724) 799-8409 Facsimile  
[bthompson@thompsonattorney.com](mailto:bthompson@thompsonattorney.com)